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13 **ATTORNEYS FOR RELATORS**

14 UNITED STATES DISTRICT COURT
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA
16 WESTERN DIVISION

17 UNITED STATES OF AMERICA, the STATES OF
18 ALASKA, CALIFORNIA, COLORADO, CONNECTICUT,
DELAWARE, FLORIDA, GEORGIA, HAWAII, ILLINOIS,
19 INDIANA, IOWA, LOUISIANA, MARYLAND,
MASSACHUSETTS, MICHIGAN, MINNESOTA,
20 MONTANA, NEVADA, NEW HAMPSHIRE, NEW
JERSEY, NEW MEXICO, NEW YORK, NORTH
21 CAROLINA, OKLAHOMA, RHODE ISLAND,
TENNESSEE, TEXAS, VERMONT, VIRGINIA, and
22 WASHINGTON, and the DISTRICT OF COLUMBIA
ex rel.

23 NICHOLAS FINCH and NICHOLAS SACCOMANNO,

24 Plaintiffs/Relators,

25 vs.

26 NIHON KOHDEN CORPORATION; NIHON KOHDEN
AMERICA, INC.; NIHON KOHDEN ORANGEMED, INC.;
27 and NK US LABS.

28 Defendants.

No. CV 18-06352-
ODW (MAAx)

**Relator's Notice of
Voluntary Dismissal
Without Prejudice**

1 Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure and the
2 False Claims Act, 31 U.S.C. § 3730(b)(1), Relators Nicholas Finch and Nicholas
3 Saccomanno (collectively, “Relators”) hereby voluntarily dismiss this matter without
4 prejudice as to the United States of America (“United States”) and the States of Alaska,
5 California, Colorado, Connecticut, Delaware, Florida, Georgia, Hawaii, Illinois, Indiana,
6 Iowa, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Montana, Nevada, New
7 Hampshire, New Jersey, New Mexico, New York, North Carolina, Oklahoma, Rhode
8 Island, Tennessee, Texas, Vermont, Virginia, State of Washington, and the District of
9 Columbia (collectively, the “Plaintiff States”).

10 Relators previously provided a copy of this Notice to counsel for the United States
11 and the Plaintiff States for their review. Pursuant to 31 U.S.C. § 3730(b)(1), counsel for
12 the United States has informed Relators that, in the interests of justice, the United States
13 consents to dismissal of this action without prejudice to the United States. The Plaintiff
14 States consent to dismissal without prejudice of the state law claims.

15 DATED: January 6, 2021

Respectfully submitted,

17 /s/ Kurt Ramlo

18 Kurt Ramlo

19 LEVENE, NEALE, BENDER, YOO & BRILL
L.L.P.

20 -and-

21 Gregory M. Utter *

22 Joseph M. Callow, Jr. *

23 KEATING MUETHING & KLEKAMP PLL

24 -and-

25 Joel D. Hesch *

26 THE HESCH FIRM, LLC

27 *Attorneys for Relators*
28

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was emailed to the below listed individuals, on this 6th day of January, 2021.

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NAMFCU Coordinators on behalf of the Plaintiff States

/s/ Kurt Ramlo
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